UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
9311 GROH ROAD
GROSSE ILE, MI 48138

NOV 4 2009

MEMORANDUM

SUBJECT: ACTION MEMORANDUM - Request for a Time-Critical Removal Action at the Cincinnati Die Cast Site, Cincinnati, Hamilton County, Ohio (Site ID #B5TZ)

FROM: Steve Renninger, On-Scene Coordinator SR
Emergency Response Branch 1/Removal Section 1

THRU: Jason H. El-Zein, Chief
Emergency Response Branch 1

TO: Richard C. Karl, Director
Superfund Division

I. PURPOSE

The purpose of this memorandum is to request and document your approval to expend up to $434,870 to conduct a time-critical removal action at the Cincinnati Die Cast Site (Site), in Cincinnati, Ohio. The response actions proposed herein are necessary in order to mitigate threats to public health, welfare, and the environment posed by the presence of uncontrolled hazardous substances at the Site, a former manufacturing facility used recently as an indoor scrap yard. The presence of hazardous substances existing at the Site has been documented, including uncontrolled, elevated concentrations of cadmium in waste piles and ignitable waste streams. The Site includes a structurally-impaired building adjacent to commercial and residential areas.

The time-critical removal action proposed herein will mitigate the threats by properly removing and disposing off-site the abandoned hazardous substances, pollutants and contaminants. Additional Site activities will include Site security; perimeter air monitoring; and removal of contaminated process equipment to complete the removal action. This response action will be conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 USC §9604(a)(1) to abate or eliminate the immediate threat posed to public health and/or the environment by the presence of the hazardous substances. The uncontrolled conditions of the hazardous substances present at the Site require that this action be classified as a time-critical removal action. The project will require approximately 20 working days to complete.

There are no nationally significant or precedent setting issues associated with the Site. The Site is not on the National Priorities List (NPL).

II. SITE CONDITIONS AND BACKGROUND

The CERCLIS ID # for this Site is: OHN 000 510 398

A. Physical Location and Description

The Site is located at 4524 West Mitchell Avenue, Cincinnati, Hamilton County, Ohio, 45232 (see Figure A-1). The Site is approximately 1.5 acres in size and located in a mixed residential/commercial area of Cincinnati, Ohio. There is one building on the Site that was constructed in 1929 and is approximately 58,000 square feet. The exterior of the structurally-impaired building is constructed of a slab concrete foundation, concrete and brick walls, and a collapsed wooden roof. Debris including drums, batteries, wood, waste piles, process equipment, scrap wire, and trash is scattered inside the building with evidence of trespassing. The Cincinnati Fire Department (CFD) condemned the building in July 2007 following a fire at the Site. The Site building has been vacant since 2007 with unrestricted access. The geographical coordinates for the Site are Latitude 39.170143° North and Longitude 84.514274° West.

According to the Region V Superfund Environmental Justice Analysis, in Ohio the low income percentage is 30% or greater and the minority percentage is 16% or greater. To meet the Environmental Justice (EJ) criteria, the area within one mile of the Site must have a population that's twice the state low income percentage and/or twice the state minority percentage. At the Site, the low income percentage is 37% and the minority percentage is 36%, see Attachment III. Therefore, this Site does meet the Region's EJ criteria based on demographics as identified in Region V's "Interim Guidelines for Identifying and Addressing a Potential EJ Case" June 1998.

B. Site Background – 1937 through 2003

According to city directories summarized in Site reports, the Site was utilized by the Union Iron and Steel Company from 1937-1975. Based on an article in the Dayton Business Journal and Hamilton County Auditor records, the Cincinnati Die Cast Company operated at the Site from approximately 1980-2000 and continued to own the Site until 2004. Equipment included two casting furnaces, lathes, piping and conduits for machinery, and trenching for coolants in the area surrounding the lathes. The furnaces were used to melt different types of metals which included carbon base steel, brass, and aluminum. Several underground storage tanks were utilized at the Site.

C. Site Background – Current Site Owner

The Site is currently vacant. Hamilton County auditor records show that Reuban Peppers holds a sheriff's deed on the property. According to the Cincinnati Fire Department inspection reports, the Site building was utilized as an indoor scrap yard from 2006-2007. The scrap

operations ceased in 2007 and the building has since remained unoccupied. Evidence of scrap operations remain at the Site with piles of scrap metal, wiring, fuel tanks, batteries, wood, waste piles, and trash.

D. Site Background – City of Cincinnati

The CFD inspected the Site building in August 2006, and noted that the formerly-vacant building was being utilized as a scrap processing facility. The CFD also noted no running water in the building and egress doors were non-operational. On May 14, 2007, the CFD and the Cincinnati Building Department conducted a Site inspection as a result of a fire at the Site that occurred on April 26, 2007. On July 24, 2007, the CFD issued a 2nd Notice letter to the Site owner ordering stop work and vacate the premises. CFD noted the following code violations at the Site: unsafe conditions, defective fire protection equipment, faulty egress doors, and lack of an underground storage tank removal plan. On June 4, 2007, the Ohio Fire Marshal-Bureau of Underground Storage Tank Regulations (BUSTR) completed an inspection and identified three underground storage tanks (USTs) containing waste oil. BUSTR observed that the Site building was being utilized for salvage operations. BUSTR issued a notice of violation for failure to manage USTs that were out of service greater than 12 months, and failure to provide registration or insurance certificates. On February 23, 2009, the City of Cincinnati Division of Property Maintenance Code Enforcement condemned the Site building due to dangerous and unsafe Site conditions.

E. Site Background – U.S. Environmental Protection Agency

On September 30, 2009, the CFD executed a search warrant at the Site. The CFD and U.S. EPA conducted an inspection at the Site to document Site conditions and obtain waste samples. U.S. EPA mobilized its Superfund Technical Assessment and Response Team (START) contractor to the Site. U.S. EPA tasked START to perform a Site Investigation including sample collection. Activities performed during the Site Investigation included:

- Documentation of Site conditions;
- Air monitoring;
- Analyzing waste piles for total metals utilizing a handheld X-ray Fluorescence (XRF) analyzer;
- Collection of waste samples from drums, tanks, and containers;
- Collection of samples from an UST containing waste oil.

During the U.S. EPA Site Investigation, the On-Scene Coordinator (OSC) and START contractor noted a structurally-impaired Site building. The structurally-impaired building is approximately 58,000 square feet, with the roof collapsed in numerous areas. Uncontainerized waste piles surrounded the furnaces and coolant trenches were filled with oil, water, and debris. Numerous unknown drums and containers were documented inside the vacant building. The OSC noted unrestricted Site access with doors and windows broken. Debris including drums,

batteries, wood, waste piles, scrap wire, electrical equipment, vegetation, and trash was scattered inside the building with evidence of trespassing. Oil staining on the building floor was documented in numerous locations due to scrap operations.

The START contractor documented the following XRF readings:

- Waste piles: Lead =12,917 ppm, Chromium =1224 ppm, Arsenic =1018 ppm
- Drums: Lead =1,032 ppm, Chromium = 3,072 ppm, Arsenic = 1,293 ppm

Laboratory analysis of samples collected during the Site Investigation yielded the following results:

- Sample CDC-WS6-093009 had a Toxicity Characteristic Leaching Procedure (TCLP) cadmium concentration of 1.25 mg/L, which exceeds the TCLP cadmium regulatory level of 1.0 mg/L, and defines the waste as characteristic hazardous waste for toxicity under the Resource Conservation and Recovery Act (RCRA) 40 CFR §261.24.
- Samples CDC-WL4-09309 and CDC-WL10-09309 had flashpoint results of 123.6 °F and 93 °F respectively. These results are less than the flashpoint regulatory level of 140 °F, and define the wastes as characteristic hazardous wastes for ignitability under RCRA

U.S. EPA Site Investigation XRF readings and sampling results are found in Table 1.

TABLE 1
U.S. EPA LABORATORY SAMPLING RESULTS
CINCINNATI DIE CAST SITE
CINCINNATI, HAMILTON COUNTY, OHIO

Parameter	Regulatory Limit	Sample Designation						
		CDC-WL1-093009	CDC-WL4-093009	CDC-WS6-093009	CDC-WL10-093009	CDC-NE18	CDC-NE19	CDC-2-102709
Flashpoint (°F)	<140 °F	NA	123.6	NA	93	NA	NA	NA
TPH								
GRO (C6-C12) (mg/kg)	NA	259	NA	NA	NA	NA	NA	NA
DRO (C10-C20) (mg/kg)	NA	69,300	NA	NA	NA	NA	NA	NA
DRO (C20-C34)(mg/kg)	NA	787,000	NA	NA	NA	NA	NA	NA
TCLP RCRA Metals (mg/L):								
Cadmium	1.0	NA	NA	1.25	NA	NA	NA	NA
Lead	5.0	NA	NA	294	NA	NA	NA	NA
Total RCRA Metals (mg/kg):								
Arsenic	NA	<33.1	NA	<24*	NA	1293*	<24*	1018*
Barium	NA	27.0	NA	NA*	NA	NA*	NA*	382*
Cadmium	NA	<9.94	NA	NA*	NA	NA*	NA*	<17*
Chromium	NA	19.0	NA	1224*	NA	<71*	1224*	239*
Lead	NA	126	NA	182*	NA	1032*	182*	12,917*
Mercury	NA	0.256	NA	<18*	NA	<475*	<18*	<25*
Selenium	NA	<33.1	NA	<6*	NA	262*	<6*	<20*
Silver	NA	<13.2	NA	NA*	NA	NA*	NA*	<12*
Container type		UST	5-gallon Bucket	Vessel	1-gallon Container	Fiber Drum	Fiber Drum	Waste Pile
Label Information		No Label	Bonding	No Label	Paint Thinner	No Label	No Label	NA

			Adhesive					
Waste Type			Ignitable Waste	Characteristic Waste - Toxicity	Ignitable Waste	Solid Waste – Elevated Metals	Solid Waste – Elevated Metals	Solid Waste – Elevated Metals

TCLP – Toxicity Characteristic Leachate Procedure
RCRA – Resource Conservation and Recovery Act
TPH – Total Petroleum Hydrocarbons
PCBs – Polychlorinated Biphenyls
VOCs – Volatile Organic Compounds
Bold, Shaded results indicate Regulatory Level exceedance

UST – Underground Storage Tank
°F – Degrees Fahrenheit
mg/L – milligrams per liter
NA – Not Applicable, Not analyzed
* - Handheld XRF results

III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions present at the Site present an imminent and substantial threat to the public health, or welfare, and the environment based upon the factors set forth in Section 300.415(b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), as amended, 40 CFR Part 300. These factors include, but are not limited to, the following:

1) **Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;**

During the September 30, 2009, U.S. EPA Site Investigation, the OSC noted abandoned waste including drums, tanks, containers, and uncontainerized waste piles. Drums were noted to be deteriorated, with contents spilled on the floor and drain areas. The structurally-impaired building is 58,000 square feet with sections of the roof collapsed above waste storage areas. Uncontainerized waste piles surrounded the furnaces and trenches were filled with oil and water. Approximately 75 unknown drums and containers were documented inside the vacant building. Waste piles surrounding the former furnaces contained elevated levels of cadmium (TCLP waste). The OSC noted unrestricted Site access with doors and windows broken. Debris including drums, batteries, wood, waste piles, scrap wire, electrical equipment, vegetation, and trash was scattered inside the building with evidence of trespassing. Oil staining on the building floor was documented in numerous locations due to scrap operations.

The U.S. EPA START contractor conducted total metals analysis using a handheld XRF instrument from inside of the site building. The START contractor documented the following XRF readings:

- Waste piles: Lead =12,917 ppm, Chromium =1224 ppm, Arsenic =1017 ppm
- Drums: Lead =1,032 ppm, Chromium = 3,072 ppm, Arsenic = 1,293 ppm

Laboratory analysis of samples collected during the Site Investigation yielded the following results:

- Sample CDC-WS6-093009 had a TCLP cadmium concentration of 1.25 mg/L, which exceeds the TCLP cadmium regulatory level of 1.0 mg/L, and defines the waste as characteristic hazardous waste for toxicity per RCRA 40 CFR §261.24.

Arsenic - Exposure to arsenic can be through ingestion, inhalation or through skin absorption. Once absorbed, arsenic is widely distributed throughout the body tissues including the liver, abdominal viscera, bone and skin. Acute arsenic poisoning in humans is usually by accidental or intentional ingestion. Although rare, acute poisoning may be

followed by difficulty in swallowing, irritation of the mouth, vomiting and diarrhea, coma and death.

Chromium - Chromium is a naturally occurring element; however, hexavalent chromium is generally produced by industrial processes such as chrome plating and finishing. The health effects of exposure to trivalent and hexavalent chromium has been researched and is well documented. Existing information about chromium, especially hexavalent chromium, is mainly related to worker exposure. Plating industry workers and workers in other industries utilizing chromium are most susceptible to toxic levels. Hexavalent and trivalent chromium can be toxic at high levels; however, hexavalent chromium is the most toxic. Chromium is also listed under D007 as a hazardous waste. According to the National Institute of Occupational Safety and Health (NIOSH), the immediately dangerous to life and health (IDLH) level for chromium is 250 micrograms per cubic meter (mg/m^3).

Lead - The effects of lead exposure are more severe for young children and the developing fetus through exposure to a pregnant woman. The harmful effects of lead include premature births, lower birth weight, decreased mental ability in the infant, learning difficulties, and reduced growth in young children. In adults, lead increases blood pressure, induces anemia as a result of the inhibition of hemoglobin synthesis, decreases reaction time, affects memory, and damages the male reproductive system. Lead is also considered by U.S. EPA to be a class B2 or probable human carcinogen.

Cadmium - Breathing high levels of cadmium can severely damage the lungs. Eating food or drinking water with very high levels severely irritates the stomach, leading to vomiting and diarrhea. Long-term exposure to lower levels of cadmium in air, food, or water leads to a buildup of cadmium in the kidneys and possible kidney disease. Other long-term effects are lung damage and fragile bones. The Department of Health and Human Services (DHHS) has determined that cadmium and cadmium compounds are known human carcinogens.

Commercial areas are located within 40 feet of the Site. Residential areas are located within 300 feet of the Site. During the September 30, 2009, U.S. EPA Site Investigation, the OSC noted unrestricted Site access with doors and windows broken. With unrestricted access onto the Site, trespassing has occurred and an accidental or intentional release of hazardous material, or contact with hazardous materials is possible. The proximity of commercial and residential areas adjacent to the Site greatly increases the likelihood of human health and environmental impacts, should such an occurrence take place. The OSC noted that rainwater enters the building (collapsed roof above waste areas) and empties into Site trenches that potentially migrates to the storm sewer or to the adjacent parking lot. Potential exposure could occur through each of these migration pathways and cause imminent endangerment to human health and the environment.

The Site was temporarily secured by the CFD on September 30, 2009, but CFD noted that access to the premises and its contaminants can be obtained easily. Exposure pathways include direct contact and inhalation associated with uncontrolled hazardous waste in and around the Site building.

2) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

During EPA Site Investigation activities, EPA and START observed and documented the presence of two deteriorated furnaces (ranging in size from 1,000 – 2,000 gallons) with spilled contents and approximately 75 drums and small containers of material located throughout the building. Additionally, a large UST was sampled and contained waste oil. EPA samples confirmed the presence of ignitable, TCLP cadmium hazardous waste at the Site. Drums and uncontainerized waste piles are uncovered, deteriorated, and/or leaking. Further deterioration of the drums may allow additional quantities of hazardous substances to migrate into the environment. Because of these factors, hazardous substances, pollutants, and contaminants in varying forms and quantities have been documented to exist on the Site.

Continued vandalism, as well as trespassing, could result in an accidental or intentional release of hazardous material, contact with hazardous materials, and/or a reaction generating toxic gases. The proximity of the Site to adjacent commercial and residential areas greatly increases the potential threats to human health and environment, should such an occurrence take place.

3) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

Southwestern Ohio receives a substantial amount of precipitation during spring, and winter temperatures are normally below freezing with regular snowfall. Weather conditions will continue to contribute to the deterioration of the building and drums, and precipitation will continue to cause contamination to spread from waste piles within the Site building. Rainwater enters the building (collapsed roof above waste areas) and empties into Site trenches that potentially migrates to the storm sewer or the adjacent parking lot.

4) Threat of fire or explosion.

The Site contains abandoned solvents. Laboratory analysis documented flashpoints as low as 93 ° F, and define the contents as characteristic hazardous waste for ignitability (D001). Therefore, the potential for a fire/explosion exists and, if such an event occurs, contaminants could become airborne and may affect the nearby population.

5) The availability of other appropriate Federal or State response mechanisms to respond to the release;

In a letter dated October 6, 2009, the CFD requested assistance from U.S. EPA in conducting a potential time-critical removal action involving uncontrolled hazardous waste at the Site. CFD noted the Site building has been compromised due to age and the Cincinnati Building Department has condemned the building due to roof integrity and removal of the fire suppression system. CFD also noted that access to the premises and its contaminants can be obtained easily.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the known and suspected hazardous substances on site, and the potential exposure pathways described in Sections II and III, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The OSC proposes to undertake the following response actions to mitigate threats posed by the presence of hazardous substances at the Site:

1. Develop and implement a Site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan;

2. Develop and implement a Site Security Plan;

3. Inventory and perform hazard characterization on all substances contained in containers, drums, waste piles, and tanks;

4. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;

5. Dismantle and decontaminate process equipment, tanks and building components associated with the product process area, as necessary;

6. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants to a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 CFR § 300.440).

7. Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal Site control consistent with the provisions of Section 300.415(l) of the NCP.

The threats posed by uncontrolled substances considered hazardous meet the criteria listed in Section 300.415(b)(2) of the NCP and the response actions proposed herein are consistent with any long-term remedial actions which may be required. Elimination of hazardous substances, pollutants and contaminants that pose a substantial threat of release is expected to minimize substantial requirements for post-removal Site controls.

The estimated costs to complete the above activities are summarized below. These activities will require an estimated 20 on-site working days to complete.

Detailed cleanup contractor costs are presented in Attachment 1.

REMOVAL PROJECT CEILING ESTIMATE

EXTRAMURAL COSTS:

Regional Removal Allowance Costs: Total Cleanup Contractor Costs (Includes a 15% contingency).	$327,870
Other Extramural Costs Not Funded from the Regional Allowance:	
Total START, including multiplier costs	+$ 35,000
Subtotal, Extramural Costs	$362,870
Extramural Costs Contingency (20% of Subtotal, Extramural Costs)	+$ 72,000
TOTAL, REMOVAL ACTION PROJECT CEILING	**$434,870**

The response actions described in this memorandum directly address the actual or threatened release of hazardous substances, pollutants, or contaminants at the Site which may pose an imminent and substantial endangerment to public health or welfare or to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

Applicable or Relevant and Appropriate Requirements

All applicable and relevant and appropriate requirements (ARARs) of Federal and State law will be complied with to the extent practicable. The OSC sent a letter dated October 5, 2009, requesting ARARs to Randy Watterworth, Ohio EPA Southwest District Office, for any

applicable State ARARs. Any State ARARs identified in a timely manner will be complied with to the extent practicable.

All hazardous substances, pollutants or contaminants removed off-site pursuant to this removal action for treatment, storage and disposal shall be treated, stored, or disposed at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-Site Rule, 40 CFR § 300.440.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed or no action will result in increased potential of the toxic and hazardous substances to release, thereby threatening the environment and the health and welfare of nearby residents and other persons who are in proximity to the Site.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be $743,022[1]

($434,870 + 24,750) + (61.66% x 459,620) = $743,022

IX. RECOMMENDATION

This decision document represents the selected removal action for the Cincinnati Die Cast Site located in Cincinnati, Hamilton County, Ohio. This document has been developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site, see Attachment II. Conditions at the Site meet the NCP §300.415(b)(2) criteria for a time-critical removal action and I recommend your approval of the proposed removal action.

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[1] Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgement interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States right to cost recovery.

The total removal project ceiling, if approved, will be $434,870. Of this, an estimated $399,870 may be used for the cleanup contractor costs. You may indicate your decision by signing below.

APPROVE: _____ DATE: 11-4-09
Director, Superfund Division

DISAPPROVE: _____ DATE: _____
Director, Superfund Division

Enforcement Addendum

Figures:

- A-1 Site Location Map
- A-2 Site Layout Map
- A-3 Sample Summary Map
- A-4 Photo Log

Attachments:

- I. Detailed Cleanup Contractor Cost Estimate
- II. Administrative Record Index
- III. Region V EJ Analysis
- IV. Independent Government Cost Estimate

cc: David Chung, U.S. EPA, 5203-G
Michael Chezik, U.S. DOI, **w/o Enf. Addendum**
Kevin Clouse, OEPA, **w/o Enf. Addendum**
Richard Cordray, Ohio Department of Attorney General, **w/o Enf. Addendum**
Chris Korleski, Director, Ohio EPA, **w/o Enf. Addendum**

ENFORCEMENT ADDENDUM

CINCINNATI DIE CAST SITE
CINCINNATI, HAMILTON COUNTY, OHIO

NOVEMBER 2009

(REDACTED 2 PAGES)

ENFORCEMENT CONFIDENTIAL
NOT SUBJECT TO DISCOVERY

FIGURE A-1

SITE LOCATION MAP

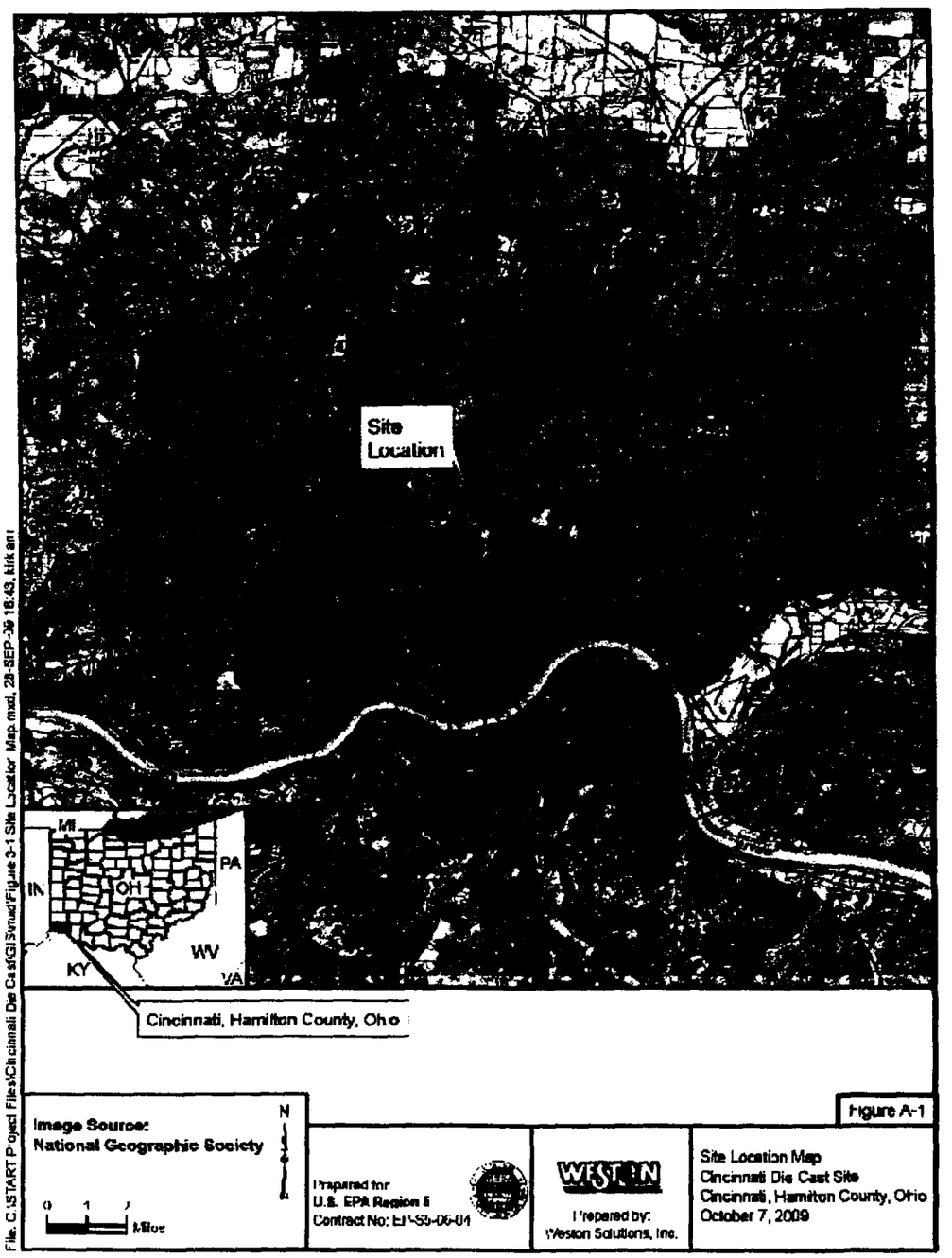


FIGURE A-2

SITE LAYOUT MAP

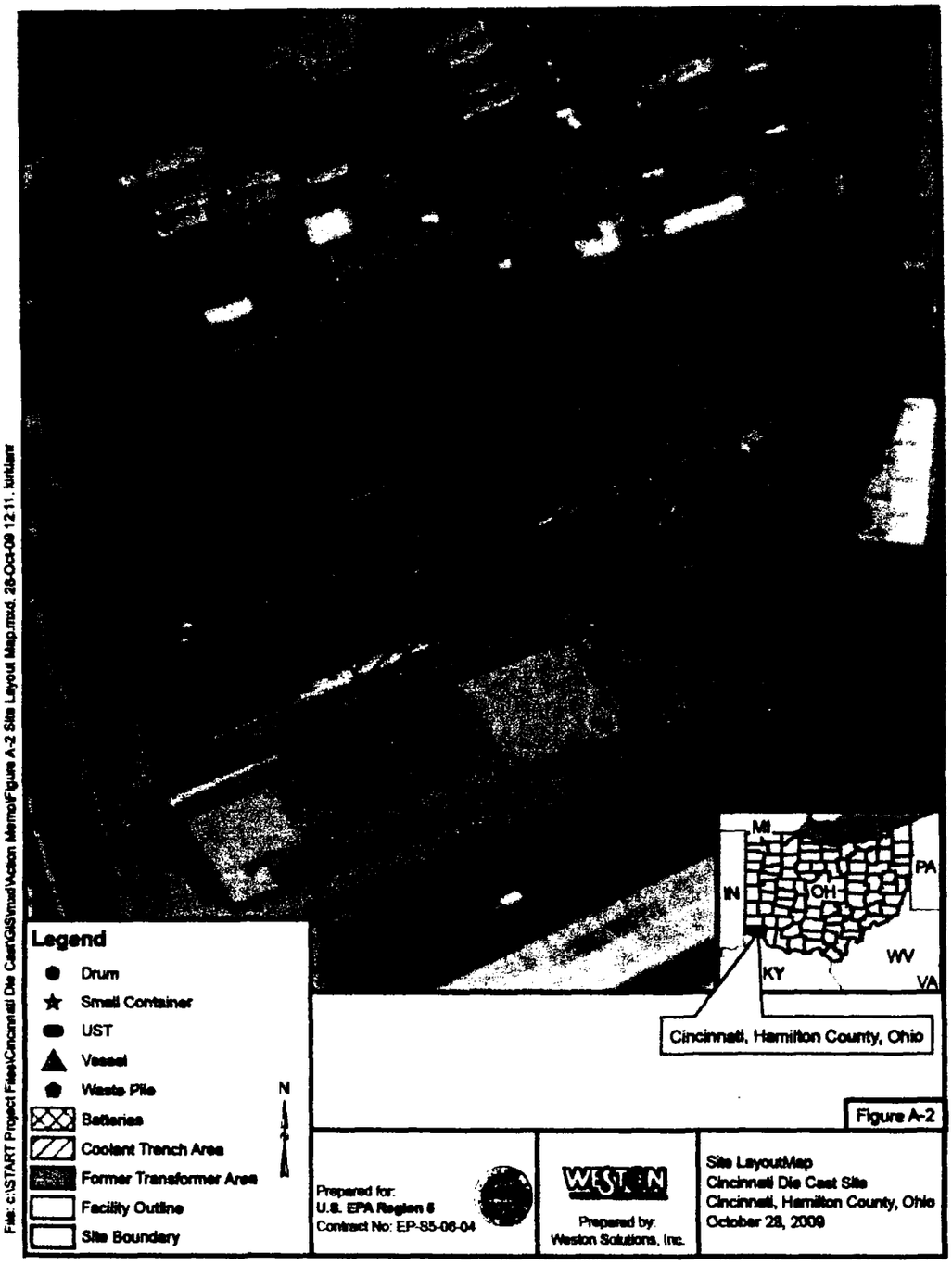


FIGURE A-3

SAMPLE SUMMARY MAP

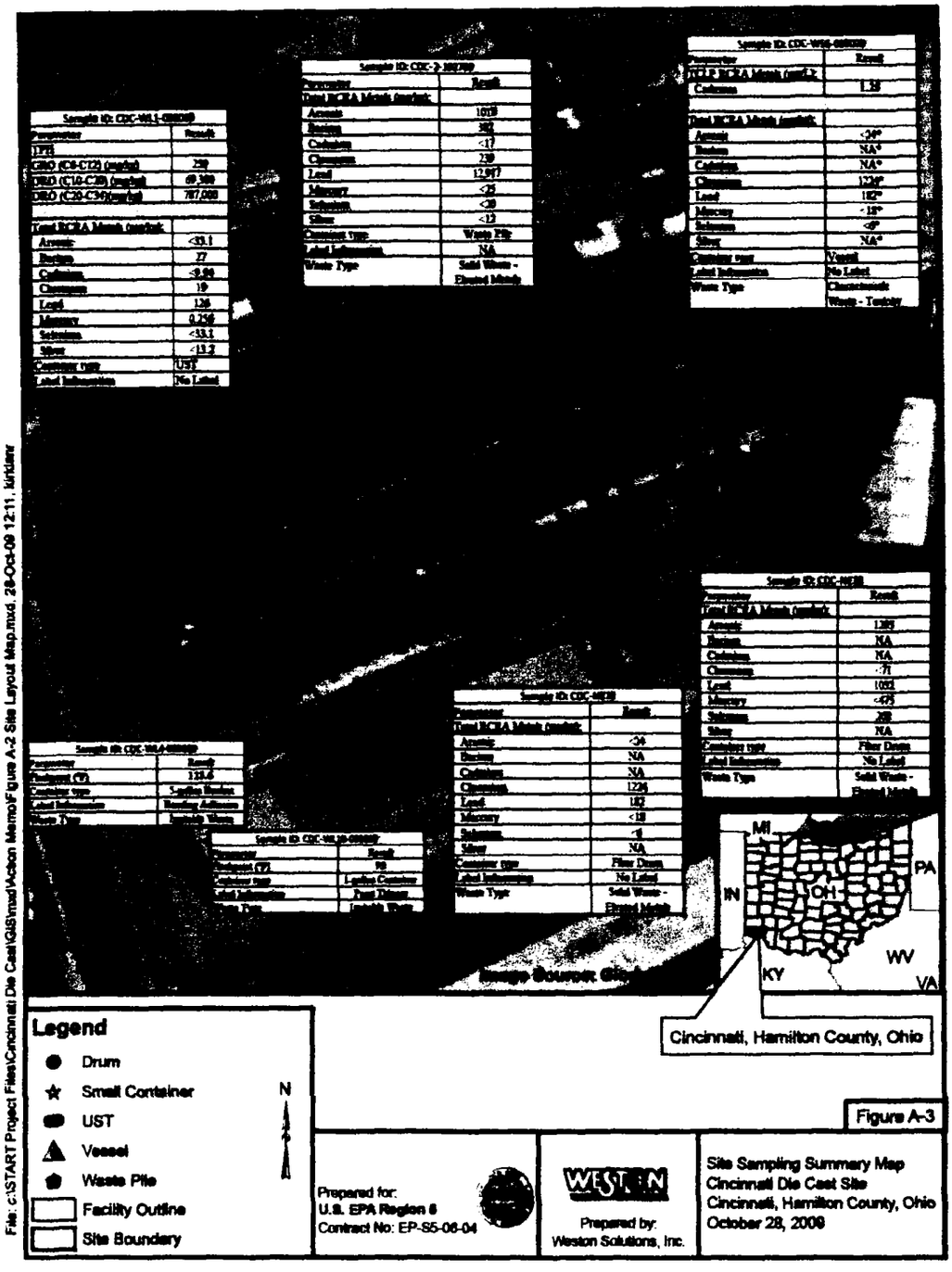


FIGURE A-4

PHOTO LOG

Above: View of furnace area and roof damage

Above: View of furnace waste pile containing cadmium.

Above: View of deteriorated fiber drums containing heavy metals waste.

ATTACHMENT I

DETAILED CLEANUP CONTRACTOR COST ESTIMATE
INDEPENDENT GOVERNMENT CLEANUP CONTRACTOR ESTIMATE

CINCINNATI DIE CAST SITE
CINCINNATI, HAMILTON COUNTY, OHIO
NOVEMBER 2009

The estimated cleanup contractor (ERRS) costs necessary to complete the removal action at the Site are as follows:

Personnel & Equipment		$ 94,870
Materials/Misc		$ 62,000
Transportation and Disposal	+	$129,000
Total		$285,870
Plus 15% Contingency	+	$ 42,000
Total ERRS Contractor Costs		**$327,870**

ATTACHMENT II

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
CINCINNATI DIE CAST SITE
CINCINNATI, HAMILTON COUNTY, OHIO

ORIGINAL
OCTOBER 2009

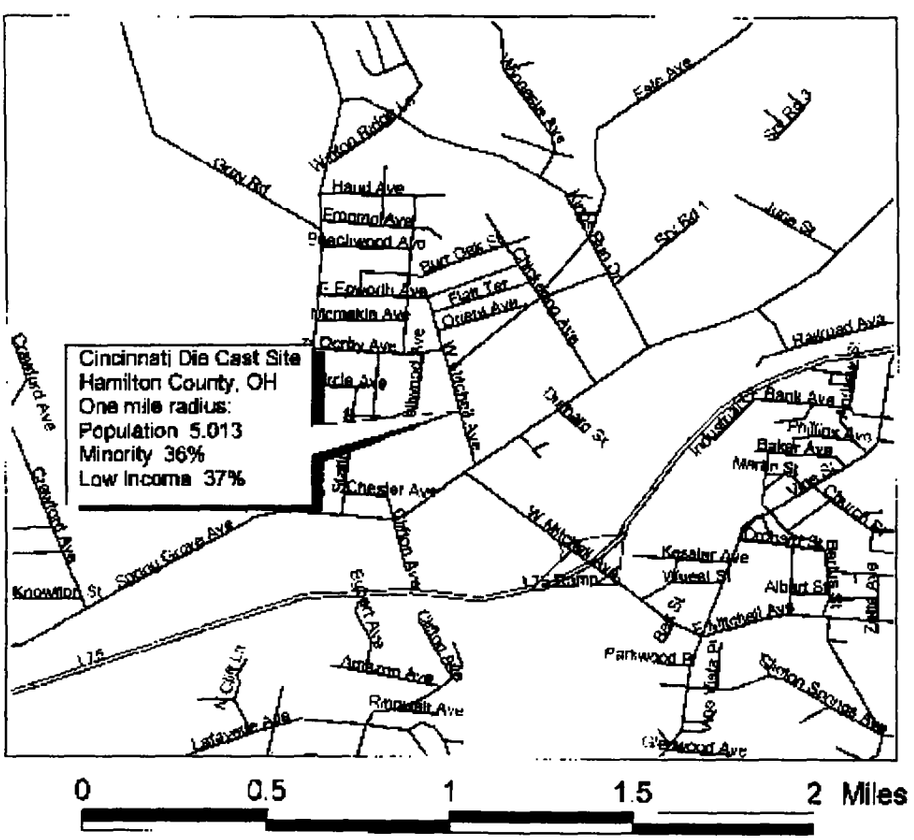
NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
1	12/15/04	Handex Of Ohio	Buckeye Asbestos Removal, Inc.	Phase I Environmental Site Assessment for the Former General Tool and Die	27
2	06/04/07	Ohio Dept. of Commerce	File	BUSTR Compliance Inspection Report for Writesel & Sons Recycling	3
3	07/24/07	Herth, D., Cincinnati Fire Dept.	Peppers, R. & R. Writesel,	Stop Work and Vacate Order for the Property at 4524 W. Mitchell Ave. 2nd Notice	2
4	09/21/09	City of Cincinnati	File	Summary of Violations and Inspections at the 4524 W. Mitchell Ave.	2
5	02/23/09	Cincinnati Dept. of Community Development	Peppers, R.	Decision - Public Hearing re: Building and Premises at 4524 W. Mitchell Ave. (Case Number: B200806254)	1
6	10/05/09	Renninger, S., U.S. EPA	Watterworth, R., Ohio EPA	Letter re: U.S. EPA Requests that Ohio EPA Identify all ARARs for the Cincinnati Die Cast Site	2
7	10/06/09	Herth, D., Cincinnati Fire Dept.	Renninger, S., U.S. EPA	Letter re: Cincinnati Fire Dept. Request for U.S. EPA Assistance at the Cincinnati Die Cast Site	1
8	00/00/00	Weston Solutions	Renninger, S., U.S. EPA	Site Assessment Report for the Cincinnati Die Cast Site **(PENDING)**	
9	00/00/00	Renninger, S., U.S. EPA	Karl, Richard U.S. EPA	Action Memorandum: **(PENDING)**	

ATTACHMENT III

REGION 5 EJ ANALYSIS

Region 5 Superfund EJ Analysis

Cincinnati Die Cast Site Cincinnati,OH



State of Ohio averages
Minority: 18%
Low Income: 30%

U.S. EPA Region 5
Environmental Justice Case
for State of Ohio

Minority: 32% or grea

Low Income: 60% or gr

ATTACHMENT IV

INDEPENDENT GOVERNMENT COST ESTIMATE

CINCINNATI DIE CAST SITE
CINCINNATI, HAMILTON COUNTY, OHIO

NOVEMBER 2009

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

(REDACTED 2 PAGES)